

Remarks

Claims 17-30, 47, 51-53, 55-56, 58-59, and 61-63 were rejected as unpatentable over JEYARAMAN 6,377,957 in view of BENSON et al. 6,202,085. Independent claims 17, 47, and 61-63 have been amended. Reconsideration and withdrawal of the rejection are respectfully requested.

The independent claims provide, among other features, that the update manager uses only a single updated minimum element which is a tree-structured portion of the structured document, where the single updated minimum element includes a plurality of updated portions. The amendment further specifies that each client device completes the update with only a single replacement operation of replacing a corresponding element with the updated minimum element.

By contrast, JEYARAMAN discloses (e.g., Figure 2) that a deletion operation, insertion operation, and additional data should be sent as an update to the client. At the client, the deletion operation is performed to delete a corresponding leaf node from the old tree and the insertion operation is performed to insert the corresponding leaf node into the old tree. Accordingly, the reference discloses two operations, namely separate delete and insert operations, where the present claims have only one. There is no suggestion for the client device to complete the update with only a single replacement operation as claimed.

By way of further explanation and with reference to Figure 3, in the presently claimed invention a new tree-structure portion with a top node (the diagonally shaded node) including updated nodes as its child nodes is sent as a minimum element to the client. At the client, a corresponding old tree-structure portion is replaced with the new tree-structured portion (minimum element). Only a single replacement operation is used at the client, which is simpler than that of JEYARAMAN.

BENSON et al. do not make up for the above-noted shortcomings of JEYARAMAN and thus the claims avoid the rejection under §103.

The dependent claims are allowable for similar reasons.

In view of the present amendment and the foregoing remarks, it is believed that the present application has been placed in condition for allowance. Reconsideration and allowance are respectfully requested.

The Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment

to Deposit Account No. 25-0120 for any additional fees required
under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17.

Respectfully submitted,

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